

THE HONORABLE JOHN H. CHUN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AEGEAN MARINE PETROLEUM S.A.,

Plaintiff,

v.

M/V KAVO PLATANOS, her tackle, boilers,
apparel, furniture, engines, appurtenances, etc.,

and

Certain Bunkers on board the M/V KAVO
PLATANOS,

Defendants *in rem*,

and

CANPOTEX SHIPPING SERVICES LTD.,
et al.,

Defendants and Garnishee.

IN ADMIRALTY

Case No. 2:15-cv-00172-JHC

**DEFENDANT'S PROPOSED CASE
SCHEDULE**

Canpotex Shipping Services Ltd. ("CSSL"), by and through its attorneys of record,
respectfully submits its Proposed Case Schedule, at the request of the Court per its Minute
Order dated September 9, 2022 [ECF 92], extending the case deadlines by no more than
ninety (90) days.

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DEFENDANT'S PROPOSED CASE SCHEDULE- 1
(CASE NO. 2:15-cv-00172-RAJ)

SCHWABE, WILLIAMSON & WYATT, P.C.
Attorneys at Law
1211 SW 5th Ave., Suite 1900
Portland, OR 97204
Telephone: 503.222.9981

CSSL therefore requests that the Court adjust the Case Schedule extending the deadlines as indicated on the schedule below:

Expert Witness Disclosure/Reports Under FRCP 26(a)(2)	September 30, 2022 December 30, 2022
Deadline to Complete Discovery. All motions related to discovery must be noted on the motion calendar no later than the Friday before discovery closes pursuant to LCR7(d)(3)	December 2, 2022 March 2, 2023
All dispositive motions and motions challenging expert witness testimony must be filed	January 20, 2023 April 20, 2023

As noted in the Court's Scheduling Order [ECF 73], this case may be resolved through dispositive motions. CSSL therefore reiterates its request that the Court refrain from setting a trial date at this time. Should a trial be necessary, CSSL requests that the Court set a trial date after its ruling on dispositive motions. CSSL respectfully requests this Court to grant their motion and submit a proposed order herewith.

Dated this 16th day of September, 2022.

SCHWABE, WILLIAMSON & WYATT, P.C.

By: s/ David R. Boyajian

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Counsel for Defendant Canpotex Shipping Services Ltd.

DEFENDANT'S PROPOSED CASE SCHEDULE- 2
(CASE NO. 2:15-cv-00172-RAJ)

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CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of September, 2022, I served the following
PROPOSED CASE SCHEDULE on:

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Attorneys for Plaintiff

☒ by electronically filing the foregoing with the Clerk of the Court using the
CM/ECF system, which will send notification of such filing to all associated counsel.

- ☐ U.S. Postal Service, ordinary first class mail
☐ U.S. Postal Service, certified or registered mail,
return receipt requested
☐ hand delivery
☐ facsimile
☐ other (specify) _____

s/ David R. Boyajian

David R. Boyajian, WSBA #50195

CERTIFICATE OF SERVICE - 1
(CASE NO. 2:15-cv-00172-RAJ)

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